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## Federal Defenders of NEWYORK, INC.

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April 26, 2022

## VIA ECF

The Honorable Judith C. McCarthy United States District Judge Southern District of New York 300 Quarropas Street, White Plains, NY 10601

Re: United States v. Dimas Ramirez, 21-cr-3591 (UA)

Dear Honorable Judge McCarthy:

I write to respectfully request that the Court modify Mr. Ramirez's bail conditions to permit him to attend an Academic Banquet on Thursday, April 28<sup>th</sup> from 6 p.m. to 11 p.m. where is daughter will be honored.

Mr. Ramirez was arrested on April 1, 2021, and charged with receipt and distribution of child pornography in violation of 18 U.S.C. §§2252A(a)(2)(B), (b)(1). Mr. Ramirez made his initial appearance on that same date before the Honorable Paul E. Davison and was released on bond. Mr. Ramirez has continued to comply with his conditions while on pre-trial release, has been attending mental health treatment, and is employed.

Mr. Ramirez seeks to attend an Annual Academic Banquet where his daughter will be honored. His wife will be present with him throughout the event. Given Mr. Ramirez continued compliance while out on release and his wife's presence at the event, Mr. Ramirez's Pre-trial Officer, Leo Barrios, has no objection to this request. I have contacted the Government, through Assistant United States Attorney Marcia Cohen, who also has no objection to this request.

Thank you for your time and consideration of this matter.

Respectfully submitted,

Elizabeth K. Quinn

Assistant Federal Defender

cc: Marcia Cohen, AUSA Leonthe Barrios, PTO

APPLICATION GRANTED

Hon. Judith C. McCarthy

4-26-2022